

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

LEAGUE OF UNITED LATIN AMERICAN CITIZENS, SOUTHWEST VOTER REGISTRATION EDUCATION PROJECT, MI FAMILIA VOTA, AMERICAN GI FORUM, LA UNION DEL PUEBLO ENTERO, MEXICAN AMERICAN BAR ASSOCIATION OF TEXAS, TEXAS HISPANICS ORGANIZED FOR POLITICAL EDUCATION, WILLIAM C. VELASQUEZ INSTITUTE, FIEL HOUSTON INC., TEXAS ASSOCIATION OF LATINO ADMINISTRATORS AND SUPERINTENDENTS, EMELDA MENENDEZ, GILBERTO MENENDEZ, JOSE OLIVARES, FLORINDA CHAVEZ, and JOEY CARDENAS,)	CIVIL ACTION NO. 3:21-cv-00259 [Lead case]
<i>Plaintiffs,</i>)	
v.)	
GREG ABBOTT, in his official capacity as Governor of the State of Texas; JOSE A. ESPARZA, in his official capacity as Deputy Secretary of the State of Texas,)	
<i>Defendants.</i>)	
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DAMON JAMES WILSON, for himself and on behalf of all others similarly situated,)	CIVIL ACTION NO. 1:21-cv-00943 [Consolidated case]
<i>Plaintiffs,</i>)	
v.)	
STATE OF TEXAS, GREG ABBOTT, in his official capacity as Governor of the State of Texas, TEXAS SPEAKER DADE PHELAN, in his official capacity as Speaker of the Texas House or Representatives, TEXAS LIEUTENANT GOVERNOR)	

DAN PATRICK, in his official capacity as Lieutenant Governor and Presiding Officer of the Texas Senate, and JOSE A. ESPARZA, in his official capacity as Deputy Secretary of the State of Texas,

Defendants.

VOTO LATINO, ROSALINDA RAMOS)
ABUABARA, AKILAH BACY,) CIVIL ACTION NO.
ORLANDO FLORES, MARILENA) 1:21-cv-00965
GARZA, CECILIA GONZALES,) [Consolidated case]
AGUSTIN LOREDO, CINIA MONTOYA,
ANA RAMÓN, JANA LYNNE SANCHEZ,
JERRY SHAFER, DEBBIE LYNN SOLIS,
ANGEL ULLOA, and MARY URIBE,

Plaintiffs,

V.

JOHN SCOTT, in his official capacity as Texas Secretary of State, and GREGORY WAYNE ABBOTT, in his official capacity as the Governor of Texas,

Defendants.

CIVIL ACTION NO.
1:21-cv-00965
[Consolidated case]

MEXICAN AMERICAN LEGISLATIVE
CAUCUS, TEXAS HOUSE OF
REPRESENTATIVES,

Plaintiffs,

CIVIL ACTION NO.
1:21-cv-00988
[Consolidated case]

V.

STATE OF TEXAS, GREG ABBOTT,
GOVERNOR OF THE
STATE OF TEXAS, in his official capacity,
and JOHN SCOTT, SECRETARY OF
STATE OF TEXAS, in his official capacity.

Defendants.

ROY CHARLES BROOKS, FELIPE)
GUTIERREZ, PHYLLIS GOINES, EVA)
BONILLA, CLARA FAULKNER,) CIVIL ACTION NO.
DEBORAH SPELL, and BEVERLY) 1:21-cv-0099
POWELL,) [Consolidated case]

Plaintiffs,)

v.)

GREG ABBOTT, in his official capacity as)
Governor of Texas; JOHN SCOTT, in his)
official capacity as Secretary of State of)
Texas,)

Defendants.)

TEXAS STATE CONFERENCE OF)
THE NAACP,)

Plaintiff,)

v.)

GREG ABBOTT, in his official capacity as)
Governor of Texas; JOHN SCOTT, in his)
official capacity as Secretary of State of)
Texas,)

Defendants.)

FAIR MAPS TEXAS ACTION)
COMMITTEE, OCA-GREATER)
HOUSTON, NORTH TEXAS CHAPTER)
OF THE ASIAN PACIFIC ISLANDER)
AMERICANS PUBLIC AFFAIRS)
ASSOCIATION, EMGAGE, KHANAY)
TURNER, ANGELA RAINY, AUSTIN)
RUIZ, AYA ENELI, SOFIA SHEIKH,)
JENNIFER CAZARES, NILOUFAR)
HAFIZI, LAKSHMI RAMAKRISHNAN,)
AMATULLA CONTRACTOR, DEBORAH)

CIVIL ACTION NO.
1:21-cv-01006
[Consolidated case]

CIVIL ACTION NO.
1:21-cv-01038
[Consolidated case]

CHEN, ARTHUR RESA, SUMITA)
GHOSH, and ANAND KRISHNASWAMY,)
Plaintiffs,)
v.)
)
GREG ABBOTT, in his official capacity as)
Governor of Texas; JOHN SCOTT, in his)
official capacity as Secretary of State of)
Texas,)
Defendants.)

LULAC PLAINTIFFS' UNOPPOSED MOTION
FOR EXTENSION OF TIME TO RESPOND TO DEFENDANTS' MOTION TO
DISMISS, FOR A MORE DEFINITE STATEMEMT, OR TO STRIKE

Plaintiffs League of United Latin American Citizens, *et al.* (“LULAC Plaintiffs”) file this unopposed motion for an extension of time until December 6, 2021 to respond to Defendants’ Motion to Dismiss, for a More Definite Statement, or to Strike, Dkt. 12. In support of this motion, LULAC Plaintiffs show that:

1. Defendants filed their motion on November 15, 2021. *Id.*
2. Pursuant to this Court’s Local Rule CV-7(D)(2), LULAC Plaintiffs’ deadline to respond to the motion is 14 days after that date, or November 29, 2021.
3. However, pursuant to Federal Rule of Civil Procedure 15(a)(1)(B) and this Court’s Local Rule CV-15(a), LULAC Plaintiffs’ deadline to amend their complaint as a matter of course is December 6, 2021.
4. LULAC Plaintiffs intend either to respond to Defendants’ motion or to amend their complaint as a matter of course. Accordingly, so that there can be a single deadline for

their response, LULAC Plaintiffs request an extension of their deadline to respond to Defendants' motion until December 6, 2021.

5. LULAC Plaintiffs do not seek this motion for delay, but for good cause. Further, this motion will not prejudice Defendants or other Plaintiffs.
6. Defendants and other Plaintiffs do not oppose the requested extension.
7. For the reasons set forth above, LULAC Plaintiffs respectfully request an extension of time to file their response to Defendants' motion through December 6, 2021.

Dated: November 24, 2021

Respectfully submitted,

/s/ Nina Perales
Nina Perales
Mexican American Legal Defense and
Educational Fund
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CERTIFICATE OF CONFERENCE

I hereby certify that, on November 23, 2021, counsel for the LULAC Plaintiffs conferred with counsel for Defendants and other Plaintiffs regarding the above motion. Counsel for Defendants and other Plaintiffs indicated they do not oppose the motion.

/s/ Nina Perales
Nina Perales

CERTIFICATE OF SERVICE

The undersigned counsel hereby certifies that she has electronically submitted a true and correct copy of the above and foregoing via the Court's electronic filing system on the 24th day of November 2021.

/s/ Nina Perales
Nina Perales